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Counsel for the Debtor and Debtor-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

V.

PATRICK HAGAMAN DAUGHERTY,

Defendant.

§ Chapter 11

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§ Case No. 19-34054-sgj11

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§ Adversary No. 20-03107-sgj

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¹ The last four digits of the Debtor's taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

ERRATA TO DEBTOR'S (I) OBJECTION TO CLAIM NO. 77 OF PATRICK HAGAMAN DAUGHERTY AND (II) COMPLAINT TO SUBORDINATE CLAIM OF PATRICK HAGAMAN DAUGHERTY

Highland Capital Management, L.P., the debtor and debtor-in-possession (the “Debtor” or “Plaintiff”) in the above-captioned chapter 11 case (“Bankruptcy Case”) and plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), hereby files this *Errata to Debtor’s (i) Objection to Claim No. 77 of Patrick Haganan Daugherty and (ii) Complaint to Subordinate Claim of Patrick Haganan Daugherty* (the “Errata”)² and respectfully states as follows:

1. The Debtor inadvertently made two legally irrelevant factual errors in the Claim Objection (together, the “Erroneous Facts”). Specifically, the Claim Objection states that Daugherty’s “employment by Strand was terminated for cause” on May 28, 2009. *See* Claim Objection ¶¶ 1 and 33. This is incorrect because (a) Daugherty was never employed by Strand Advisors, Inc., and (b) the Debtor takes no position at this time on whether Mr. Daugherty was removed “for cause” from his position as an officer of Strand Advisors, Inc.

2. The second sentence of paragraphs 1 and 33 of the Claim Objection should be deemed to be deleted and replaced with the following sentence: “Mr. Daugherty ceased to be an officer of Strand Advisors, Inc., on or about May 28, 2009.”

3. For the avoidance of doubt, the Debtor does not rely on the Erroneous Facts to support its Claim Objection and is filing this Errata to enable the parties and the Court to focus on the merits of the Daugherty POC and the Claim Objection thereto.

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² Capitalized terms not defined herein shall have the meanings ascribed to them in the *Debtor’s (i) Objection to Claim No. 77 of Patrick Haganan Daugherty and (ii) Complaint to Subordinate Claim of Patrick Haganan Daugherty* [Adv. Docket No. 1] (the “Claim Objection”) filed on August 31, 2020.

Dated: September 29, 2020.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on September 29, 2020, true and correct copies of the foregoing document were served on the parties listed below via electronic service at the e-mail addresses listed.

/s/ Zachery Z. Annable
Zachery Z. Annable, Esq.

Counsel for Patrick Hagaman Daugherty: Mr. Jason Kathman Pronske & Kathman, P.C. 2701 Dallas Parkway, Suite 590 Plano, Texas 75093 jkathman@pronskepc.com <i>(via electronic service)</i>	
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